

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE
JORGE W. CRUZ LOPEZ, INC.

DEBTOR

CASE NO. 10-09773 ESL

CHAPTER 11

APPLICATION FOR EMPLOYMENT OF ACCOUNTANT

Comes now Jorge W. Cruz López, Inc., Debtor in possession herein, through its president Jorge W. Cruz López, who respectfully States and Prays as follows:

1. The debtor has filed a petition under Chapter 11 of the Bankruptcy Code.
2. Section 327(a) of the Bankruptcy Code provides as follows:

"§ 327. Employment of Professional Persons.

(a) Except as otherwise provided in this section, the trustee, with the court's approval, may employ one or more attorneys, accountants, appraisers, auctioneers, or other professional persons, that do not hold or represent an interest adverse to the estate, and that are disinterested persons, to represent or assist the trustee in carrying out the trustee's duties under this title."

3. The debtor desires to retain the professional services of Luis Cruz López, C.P.A. as his accountant.

4. Luis Cruz López's physical and postal address is the following: 172 La Coruña Street, Ciudad Jardín, Caguas, Puerto Rico 00727. Telephone and Fax numbers are 787.703.2552 and 787.747-6620 respectively.

5. To the best of my knowledge and belief, Luis Cruz López is a "disinterested person", as said term is defined in 11 USC 101 (14), which definition is incorporated herein by reference; does not represent any creditor in this case or any interested party herein, nor any one

acting on their behalf, whose interest may be adverse to debtor's estate; he has no connection with debtor -the fact that both of his surnames exactly match those of the president of the debtor has been a matter of chance, these are extremely common surnames in Puerto Rico-, nor with his respective attorneys, nor with the US Trustee, or any person employed in any capacity with the office of the US Trustee in any office in or outside the continental United States, and furthermore, represents no adverse interest to the estate herein. Moreover, he has not acted as an investment banker or represented an investment banker with respect to the sale of security of the debtor or under any other circumstances.

6. In compliance with 11 USC §327 and §504 of the Bankruptcy Code, a certificate executed by Luis Cruz López, C.P.A., is attached to this application, along with his curriculum vitae as required by LBR 2014-1.

7. If the appointment of Luis Cruz López, C.P.A., is approved by this Honorable Court, the fees to be paid are as follows: \$150.00 per hour. Payment of fees shall be made only upon application to and approval by this Honorable Court as provided by Section 331 of the Bankruptcy Code. A retainer of \$2,000.00 has been paid to Mr. Luis Cruz López to be applied to work performed..

WHEREBY, based on the foregoing, debtor respectfully requests that it be granted leave to retain the professional services of Luis Cruz López, C.P.A..

RESPECTFULLY SUBMITTED on this November 2, 2010.

s/ Jorge W. Cruz López
Jorge W. Cruz López, President
Jorge W. Cruz López, Inc

NOTICE TO CREDITORS AND PARTIES IN INTEREST

Within twenty one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if your were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought in the attached documents, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (I) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE: I hereby certify that on November 2, 2010, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system which will send notification of such filing to:

MONSITA LECAROSZ ARRIBAS ustpregion21.hr.ecf@usdoj.gov
TERESA M LUBE CAPO lubeysoto@gmail.com, terelube@gmail.com;
nilda.buffill@gmail.com; lysconsuelo@gmail.com; lubeysotoII@gmail.com

as appears from the CM/ECF Creditor Information, The following is the list of parties who are not on the list to receive e-mail notice/service for this case (who therefore require manual noticing/service): (No manual recipients); and I hereby certify that I have mailed by first class prepaid U.S. Postal Service true and correct copies of the foregoing and its attachments to all creditors and parties in interest not otherwise notified per the attached updated master address List.

/s/ Teresa M. Lube Capo

TERESA M. LUBE CAPO, ESQ.

USDC 122205

LUBE & SOTO LAW OFFICES

Attorneys for debtor:

Jorge W. Cruz López, Inc.

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VERIFIED STATEMENT

I, Luis Cruz López, CPA do hereby certify under penalty of perjury that the following is true and correct:

1. I am Certified Public Accountant authorized to practice in Puerto Rico. Copy of my professional curriculum vitae is attached to this statement.

2. My offices are located at 172 Calle La Coruña, Ciudad Jardín, Caguas, Puerto Rico. My postal address is the same. Telephone and fax numbers are 787.703.2552 and 787.747.0620 respectively.

3. To the best of my knowledge and belief, I am a "disinterested persons", as said term is defined in 11 USC §101(14), which definition is incorporated herein by reference, and do not represent any creditor in this case, nor any interested party herein, nor anyone acting on their behalf, whose interest may be adverse to the debtor's estate; I have no connection with the debtor, nor with his attorneys, nor with the US Trustee, or any person employed in any capacity with the office of the US Trustee in any office in or outside the continental United States.

5. I have agreed to perform the following tasks for the debtor: bookkeeping, preparation of monthly operating reports, preparation of tax returns, prepare reports and analysis as required in order to offer adequate disclosures to his creditors and attain confirmation of a Chapter 11 plan of reorganization..

6. It has been agreed between debtor and the undersigned Accountant that fees will be paid at the following rates: \$150.00 per hour. Payment of said fees shall be made only upon application to and approval by this Honorable Court, as provided by the Bankruptcy Code. I have received the amount of \$2,000.00 as a retainer to be applied to work performed.

7. There is no agreement on the part of the undersigned for the sharing of any of the compensation to be received for the services to be rendered to the Debtor, except with members of my same firm.

8. I will amend this statement immediately upon my learning that: (a) any of the representations made herein are incorrect, or (b) there is any change of circumstances relating thereto.

9. I have reviewed the provisions of LBR 2016-1.

In San Juan, Puerto Rico, this November 2, 2010.

s/Luis Cruz López
Luis Cruz López

LUIS CRUZ-LOPEZ, CPA

172 La Coruña Street
Ciudad Jardín
Caguas, Puerto Rico 00727

Telephone: (787) 703-2552
Fax: (787) 747-0620
Email: lcruz@prtc.net

Business Accounting and Financial Advisor

Areas of Expertise

Professionally qualified business Certified Public Accountant with over twenty five (25) years accounting experience, supporting and assisting clients in all areas of accounting, with impact on commercial strategies and business development. Financial support includes financial forecast, projections and financial advisory services to support business proposals before banking institutions and private investors. Other areas of expertise involve support during internal auditing proceedings and governmental audits including, but not limited, to the Puerto Rico Treasury Department. Client portfolio is comprised of corporations, partnerships, non-profit organizations, churches and individual businesses. Moreover, has provided accounting support, involving report tendering for the Puerto Rico and Bankruptcy Courts.

Professional Development:

Certified Public Accountant, 2001.

BCU, Major in Accounting, 1982.

BCU, Minor in Management, 1982.

Professional Experience and Significant Achievements

Has been financial, auditing and accounting advisor to one of the major motor vehicle dealers in Puerto Rico for more than ten (10) years.

Has provided financial, auditing and accounting business support to the main Puerto Rico Company distributing health products for more than twenty (20) years.

Has provided accounting and financial support to more than fifty (50) retail and service companies with principal place of business in the Continental United States and/or Puerto Rico.

Has provided financial, auditing and accounting support to one of the main commercial vehicle part distributors in Puerto Rico.

Accounting and Financial advisor to six (6) nonprofit and religious organizations in Puerto Rico.